

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

vs.

COLLINS MURPHY, SHARON
HAMMONDS, BRENDA F. WATKINS,
LIMESTONE UNIVERSITY, MG
FREESITES, LTD., d/b/a PORNHUB.COM,
MG FREESITES II LTD., MINDGEEK
S.A.R.L., MINDGEEK USA, INC., MG
BILLING LTD., and HAMMY MEDIA LTD.
d/b/a XHAMSTER.COM, TRAFFICSTARS
LTD., WISEBITS LTD, XHAMSTER IP
HOLDINGS LTD, WISEBITS IP LTD.,

Defendants.

Case No.: 7:20-cv-00947

**WISEBITS IP, LTD'S MOTION TO
CONTINUE**

JANE DOE,

Plaintiff,

vs.

LIMESTONE UNIVERSITY F/K/A
LIMESTONE COLLEGE, COLLINS
MURPHY, MG FREESITES, LTD., d/b/a
PORNHUB.COM, and HAMMY MEDIA,
LTD. d/b/a XHAMSTER.COM,

Defendants.

Case No.: 7:21-cv-03193

**WISEBITS IP, LTD'S MOTION TO
CONTINUE**

This matter is before the Court on motion of the defendant, Wisebits IP, LTD, to continue the Hearing on All Pending Motions currently scheduled for May 29, 2024. Counsel for Wisebits IP, LTD, have a scheduling conflict that will prevent them from arguing the motions on the day set. Specifically, on May 29, 2024, the undersigned counsel will be in the second day of a date-certain jury trial in circuit court. Defendant's other counsel are also unavailable as they will be

attending the previously-scheduled graduation for the child of one defendant's counsel and on a previously scheduled vacation overseas.

Undersigned counsel has consulted with all counsel of record and is authorized to inform the court that all counsel of record consent to this motion. Defendant also proposed fourteen possible dates for the hearing and all counsel have indicated that they are available for any hearing that may be scheduled on June 10, 2024.

Accordingly, the undersigned counsel respectfully requests the Court to continue the Hearing on All Pending Motions.

Respectfully submitted,

/s/ Hannah Rogers Metcalfe
Hannah Rogers Metcalfe, Fed ID. 9943
Metcalfe & Atkinson, LLC
1395 South Church Street
Greenville, South Carolina 29605
(864) 214-2319

Evan Fray-Witzer (*pro hac vice*)
CIAMPA FRAY-WITZER, LLP
20 Park Plaza, Suite 505
Boston, Massachusetts 02116
Telephone: 617-426-0000
Facsimile: 617-423-4855
Evan@CFWLegal.com

Valentin D. Gurvits (*pro hac vice*)
Frank Scardino (*pro hac vice*)
BOSTON LAW GROUP, PC
825 Beacon Street, Suite 20
Newton Centre, Massachusetts 02459
Telephone: 617-928-1804
Facsimile: 617-928-1802
vgurvits@bostonlawgroup.com
frank@bostonlawgroup.com
Attorneys for Defendant Wisebits IP, Ltd.

May 15, 2024
Greenville, South Carolina